

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

VS.

VOLVO CONSTRUCTION EQUIPMENT  
NORTH AMERICA, INC., VOLVO TRUCKS  
NORTH AMERICA, INC., KOMATSU  
AMERICA CORP., CATERPILLAR, INC.,  
HYUNDAI CONSTRUCTION EQUIPMENT  
AMERICAS, INC., TOPCON TIERRA,  
STARTRAK SYSTEMS, LLC, WIRELESS  
MATRIX USA, LLC, JLG INDUSTRIES  
INC., TYLER TECHNOLOGIES, INC.,  
GEOTAB, INC., and NAVISTAR, INC.,

Defendants.

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CIVIL ACTION NO. 6:10-cv-00327-LED

## JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO THE COUNTERCLAIMS OF**  
**DEFENDANT GEOTAB, INC.**

Plaintiff INNOVATIVE GLOBAL SYSTEMS LLC (“Plaintiff”) responds to the counterclaims of Defendant GEOTAB, INC. (“Defendant”) filed September 9, 2010, as follows:

## COUNTERCLAIM

47. No response to Paragraph 47 is necessary.
48. Plaintiff admits the allegations in Paragraph 48.
49. Plaintiff admits the allegations in Paragraph 49.

**COUNT ONE**

## **Declaratory Judgment of Non-Infringement of the Patents-in-Suit**

50. Plaintiff incorporates each of the preceding paragraphs as though expressly stated herein.

51. Plaintiff admits the allegations in Paragraph 51.

52. Plaintiff denies the allegations in Paragraph 52.

## **COUNT TWO**

### **Declaratory Judgment of Invalidity of the Patents-in-Suite**

53. Plaintiff incorporates each of the preceding paragraphs as though expressly stated herein.

54. Plaintiff denies the allegations in Paragraph 54.

## **COUNT THREE**

### **Attorneys' Fees and Costs**

55. Plaintiff incorporates each of the preceding paragraphs as though expressly stated herein.

56. [Mis-numbered as 54 in Defendant's Counterclaim] Plaintiff denies the allegations in Paragraph 56 [mis-numbered as 54 in Defendant's Counterclaim].

## **REQUEST FOR RELIEF**

Although no answer is required to Defendant's request for relief, Plaintiff denies all allegations of Paragraphs a) through g) and further denies that any relief should be granted to Defendant.

Plaintiff demands a trial by jury on all matters raised by Defendant's counterclaims and by Plaintiff in its Original Complaint (and any supplements or amendments thereto).

**Dated: September 24, 2010.**

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
INNOVATIVE GLOBAL SYSTEMS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of September, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Michael T. Cooke

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